

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**KAREN WHITE,**

**Plaintiff,**

**v.**

**CIVIL ACTION NO. 3:12cv00115**

**BMW OF NORTH AMERICA, LLC.,**

**Defendant**

**PLAINTIFF'S MEMORANDUM IN SUPPORT OF MOTION FOR ENLARGEMENT OF  
TIME IN WHICH TO DESIGNATE WITNESS**

COMES NOW, the Plaintiff, KAREN WHITE, by counsel, in support of her Motion for Enlargement of time in which to designate a witness and states as follows:

On September 10, 2012, Plaintiff identified her witnesses that she intends to use at the trial of this matter. Pursuant to the Court's Pretrial Order, September 10, 2012 was the deadline in which Plaintiff was to designate her witnesses, however, Plaintiff just today has been advised by a technician of Casey BMW that the engine that BMW replaced in her automobile must again be torn down and repaired.

Plaintiff listed "representative of Casey Auto Group/Casey BMW" within her list of witnesses previously designated and therefore, the Defendant will not be prejudiced by this late designation.

Plaintiff therefore requests the Court's entry of the proposed Order attached to her Motion.

Respectfully submitted,  
**KAREN WHITE,**

/s/

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*Counsel for Plaintiff*

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 12<sup>th</sup> day of September, 2012, I will file the foregoing motion electronically using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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/s/

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